

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

Scott Bodley,
Defendant.

**NOTICE OF MOTION AND MOTION FOR
WITHDRAWAL OF COUNSEL AND FOR
EXTENSION OF TIME IN WHICH TO
FILE PRETRIAL MOTIONS**

Case No. 13 CR 52

TO: AUSA Dan Graber
Office of the United States Attorney
City Station
660 W. Washington Ave.
Madison, WI 53703

PLEASE TAKE NOTICE that Attorney Toni H. Laitsch will move the Honorable Magistrate Judge Stephen L. Crocker, United States District Court for the Western District of Wisconsin, on the ____ day of ____, 2013, at _____.m., to hear arguments and rule on the attached Motion.

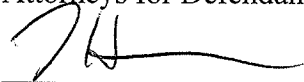
MOTION

NOW COMES, Attorney Toni H. Laitsch, attorney of record for the Defendant in the above-entitled action, upon all the files, records and proceedings in this case and the affidavit attached hereto, and hereby moves the Court for an extension of time for Defendant to file pretrial motions and for permission to withdraw her appearance as counsel of record

for the Defendant on the grounds that Defendant and movant have irreconcilable differences which undermine the attorney-client relationship. New counsel is requested to be appointed to represent the Defendant in this matter. In addition an extension of time in which to file pretrial motions is necessary

Dated this August 26, 2013.

Respectfully Submitted,
KNOLL & LAITSCH, S.C.
Attorneys for Defendant

A handwritten signature in black ink, appearing to read 'TH' followed by a long horizontal stroke.

By: Toni H. Laitsch
SBN: 1001526

121 S. Pinckney Street - Suite 550
Madison, WI 53701
(608) 255-2560

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

SCOTT BODLEY
Defendant.

**AFFIDAVIT IN SUPPORT OF MOTION FOR
WITHDRAWAL OF COUNSEL AND FOR
EXTENSION OF TIME TO FILE PRETRIAL
MOTIONS**

Case No. 13 CR 52

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

I, Toni H. Laitsch, being duly sworn on oath, do hereby depose and state the following:

1. I am the attorney for Defendant and have personal knowledge of the contents herein.
2. I was appointed by the Court to represent the Defendant on June 11, 2013
3. There are irreconcilable differences between the Defendant and myself concerning the filing of pretrial motions and the case in general. As such it is clear that the Defendant lacks trust and confidence in my role as counsel and there is no chance of maintaining an effective attorney-client relationship.
4. While the Defendant has not specifically asked for me to withdraw, based on our communications I am confident that that is his desire.
5. I wish to withdraw as counsel and request that the Court appoint new counsel to represent Defendant in this matter.
6. Defendant's Pretrial motions are due August 26, 2013
7. A pretrial motion hearing and any evidentiary hearing is scheduled for 9:30 a.m. on August 29, 2013.

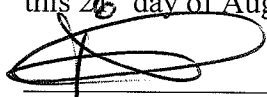
8. This case is scheduled for a one week jury trial on October 21, 2013.
9. This affidavit is made in support of the Motion to which is attach.

Dated this 26st day of August, 2013



Toni H. Laitsch

Subscribed and sworn to before me
this 26st day of August, 2013



Notary Public, County of Dane
My commission is permanent.